

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

FLEET ENGINEERS, INC.

a Michigan Corporation,

Plaintiff

v.

MUDGUARD TECHNOLOGIES, LLC

a Tennessee limited liability company,

TARUN SURTI

an Individual,

Defendant

Case No. 1:12-CV-1143

Hon. Paul L. Maloney

FILED - KZ

April 3, 2020 11:25 AM

U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

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PRO SE DEFENDANT'S SECOND MOTION FOR SUMMARY JUDGMENT

“REQUEST TO ENTER JUDGMENT EXPEDITIOSLY”

WHEREFORE, Pro Se Defendant, Mr. Surti, hereby moves this Court and requests that this honorable Court to enter a summary judgment, without claim 19, declaring that Plaintiff has directly infringed, contributorily infringed, and induced infringement of one or more claims of the '755 reissue Patent.

1. Finding that claim 1, 2, 5, 8, 9, and 13 of United States Patent No. RE 44,755 are literally infringed by Plaintiff's Aero-Flap brand mud flaps part nos. 033-08001, 033-08002, and 033-08004. (Exhibit A-C)
2. Finding that claim 1, 2, 5, 8, 9, and 13 of United States Patent No. RE 44,755 are infringed under the doctrine of equivalents by Plaintiff's Aero-Flap brand mud flaps part nos. 033-08001. (Exhibit A-C)
3. Issuing a permanent “Cease and Desist Order” against the Plaintiff, Fleet Engineers Inc.

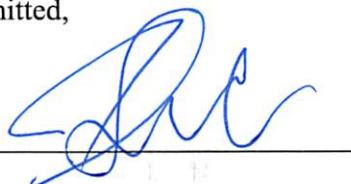
4. Issuing a permanent “Cease and Desist Order” against makers, sellers, buyers, users, importers and exporters of Aero-Flap brand mud flaps.
5. Awarding all costs and fees incurred in connection with this action to the Defendants.
6. Awarding the Defendants damages, including lost profits, such damages to be trebled; and
7. Awarding such other and further relief as this court may deem proper, including reasonable attorney fees, this being an exceptional case.

JURY TRIAL

A JURY TRIAL IS DEMANDED.

Respectfully submitted,

By: _____



Tarun N. Surti, Individually
President, Mudguard Technologies, LLC
Pro Se Defendants
5928 Westheimer Drive
Brentwood, TN 37027
Tel: (615) 812-6164
Email: vflaps@gmail.com

Dated: March 31, 2020

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